

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JOHNNIE MARKEL CARTER	:	VIOLATIONS:
NATHANIEL GRIFFIN	:	18 U.S.C. § 371 (conspiracy to commit
NAKIA RICHARDSON	:	armed bank robbery- 1 count)
	:	18 U.S.C. § 2113(d)(armed bank robbery
	:	-1 count)
	:	18 U.S.C. § 924(c)(1)(carrying and using
	:	a firearm during a crime of violence - 1
	:	count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about April 19, 2007, in Springfield, in the Eastern District of Pennsylvania, defendants

**JOHNNIE MARKEL CARTER,
NATHANIEL GRIFFIN, and
NAKIA RICHARDSON**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery of the United Savings Bank, 301 Baltimore Pike, Springfield, Pennsylvania (hereafter “the bank”), the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was part of the conspiracy that defendants JOHNNIE MARKEL CARTER, NATHANIEL GRIFFIN, NAKIA RICHARDSON, and others known and unknown to the grand jury committed a gunpoint armed robbery of the United Savings Bank, located at 301 Baltimore Pike in Springfield, Pennsylvania stole approximately \$53,356.

OVERT ACTS

In furtherance of the conspiracy, the defendants committed the following overt acts in the Eastern District of Pennsylvania:

On or about April 19, 2007:

1. Defendants JOHNNIE MARKEL CARTER, NATHANIEL GRIFFIN, and NAKIA RICHARDSON, and another individual unknown to the grand jury drove together to the United Savings Bank, located at 301 Baltimore Pike in Springfield, Pennsylvania, for the purpose of committing an armed bank robbery.

2. Defendants JOHNNIE MARKEL CARTER and NATHANIEL GRIFFIN entered the bank with another individual unknown to the grand jury, and forced their way into the bank's vault at gunpoint. The defendants stole cash from the vault, while defendant CARTER pointed a firearm at bank employees.

3. Defendants JOHNNIE MARKEL CARTER and NATHANIEL GRIFFIN, and another individual unknown to the grand jury, also stole cash from bank teller drawers, while defendant CARTER continued to point a firearm at bank employees.

4. Defendants JOHNNIE MARKEL CARTER and NATHANIEL GRIFFIN, and another individual unknown to the grand jury, fled from the bank with approximately \$53,356 and entered a getaway car driven by defendant NAKIA RICHARDSON and drove away.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 19, 2007, in Springfield, in the Eastern District of Pennsylvania, defendants

**JOHNNIE MARKEL CARTER,
NATHANIEL GRIFFIN, and
NAKIA RICHARDSON**

knowingly and unlawfully, by force and violence, and by intimidation, took , and aided and abetted the taking, from employees of the United Savings Bank, 301 Baltimore Pike, Pennsylvania, lawful currency of the United States, that is, approximately \$53,356, belonging to, and in the care, custody, control, management and possession of the United Savings Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in so doing, defendants CARTER, GRIFFIN, and RICHARDSON knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the United Savings Bank, by use of a dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 19, 2007, in Springfield, in the Eastern District of Pennsylvania, defendants

**JOHNNIE MARKEL CARTER,
NATHANIEL GRIFFIN, and
NAKIA RICHARDSON**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, conspiracy to commit armed robbery, in violation of Title 18 United States Code Section 371, and armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney